

from the collocation area, various problems previously discussed cannot be addressed by the use of the MDF.<sup>46</sup>

Assuming an MDF was used as the interface point between SWBT's DSX-1 bays and an interconnector's equipment (neglecting DS3, power, central office and cage grounding) there is a high probability that the added distance (DSX to MDF to interconnector's equipment) would result in the need to add regeneration (repeaters) in the design. The added repeaters would make interconnection more expensive.

The Point of Termination frame is just what the name implies -- a point where SWBT facilities (all facilities not just DS1/DS3) are terminated to those of the interconnector. A Point of Termination has to exist for DC power, DS1/DS3, ground, etc. SWBT will need to provision such a point of termination frame and if its cost is not recovered from the interconnector, SWBT will have no choice but to recover the POT frame cost from its other customers.

The Commission cannot eliminate the requirement for a Point of Termination between SWBT and the interconnectors. Furthermore, the Commission should not relieve the interconnectors from the responsibility of paying for their Point of Termination at the expense of the LECs' other customers.

#### VII. DARK FIBER IS NOT ELIGIBLE FOR EXPANDED INTERCONNECTION.

ALTS, TCG and MFS claim that SWBT's policy on dark fiber

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<sup>46</sup> For example, the inadequate protection of power and the inability to quickly resolve service problems.

interconnection is unreasonable,<sup>47</sup> but none of them is able to rebut SWBT's citation to the Commission's position on this issue.<sup>48</sup> Neither ALTS nor TCG even attempt to do so, while MFS appears to say that the Commission is free to find a different result in this proceeding. MFS fails to note that the Commission itself not only stated, but emphasized to the Court that the expanded interconnection rules did not require BOCs to offer physical collocation "in connection with BOC-provided dark fiber."<sup>49</sup> MFS offers no reason why the Commission may make one legal argument to advance its position in an appellate forum, but also accept the opposite argument in a regulatory forum. A change in forum is simply insufficient as a matter of law and judicial credibility, particularly as nothing relevant has changed since March 15, 1993 (the date of the Commission's representation) to warrant any such reversal of position.

A. SWBT's Direct Case Demonstrates that SWBT's Position on Dark Fiber Interconnection Meets the Requirements of the Special Access Order.

Contrary to MFS' assertion, the issue of whether the LECs should be required to offer dark fiber interconnection is not an issue for investigation or reconsideration.<sup>50</sup> Rather, the Commission asked whether LEC prohibition of dark fiber

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<sup>47</sup> ALTS at pp. 34 and 35, TCG at pp. B-5 and B-6, MFS at pp. 27-31.

<sup>48</sup> SWBT Direct Case at p. 32.

<sup>49</sup> In re U S WEST Communications, Inc., Case No. 93-1075 (D.C. Cir.), Response of FCC to Petition for Writ of Mandamus, at pp. 9-10 (Mandamus Response) (emphasis original).

<sup>50</sup> MFS at p. 30.

interconnection is consistent with the Special Access Order.<sup>51</sup> Despite MFS' untimely attempt at reconsideration, the Special Access Order does not require expanded interconnection with LEC-provided dark fiber.

As SWBT has previously noted, in the Special Access Order, the Commission required:

that the Tier 1 local exchange carriers (LECs) offer expanded interconnection to all interested parties, permitting competitors and high volume users to terminate their own special access transmission facilities at LEC central offices.<sup>52</sup>

Further, in opposing U S WEST's petition for Writ of Mandamus, the Commission stated to the Court of Appeals that:

U S West also mistakenly claims that having to provide dark fiber (at least until the FCC acts on its Section 214 application), viewed in tandem with the Commission's new "expanded interconnection" rules, will place the carrier "in the end-to-end facilities business with no recourse to this Court for relief." In fact, contrary to U S West's apparent assumption, the expanded interconnection rules only require the BOCs to offer physical collocation (within the BOC central office) to customers seeking to interconnect their own special access transmission facilities at the BOC central office. They do not require the BOCs to offer physical collocation in connection with BOC-provided dark fiber.<sup>53</sup>

Consistent with the Commission's Order, Section 64.1401(d)(2) of the Commission's rules sets out this text. Clearly, the Commission's words have left no room for ambiguity here. The

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<sup>51</sup> Designation Order at para. 38.

<sup>52</sup> Expanded Interconnection with Local Telephone Company Facilities, 7 FCC Rcd 7369, (1992) (Special Access Order) at para. 1, (emphasis added).

<sup>53</sup> Mandamus Response, at pp. 9-10 (emphasis original).

Special Access Order and the Commission's rules do not require the LECs to offer expanded interconnection to LEC-provided dark fiber.

B. Expanded Interconnection Requires Connection to a LEC Premises to Hub Service.

The Special Access Order implemented interconnection so that interconnector services could be connected to LEC services within the central office. The theory contemplated that interconnector transport could be directly connected to LEC channel terminations within the central office thereby enhancing competition for interoffice transport. For example, an interconnector's DS3 transport could be demultiplexed in its collocated space and connected to LEC DS1 channel terminations within the central office. Hence, interconnection to a LEC service that is provided from a customer premises to a central office is required.

However, SWBT has never offered dark fiber from a customer premises to a central office, whether on a common carrier basis or otherwise. Thus, no interconnection with SWBT dark fiber is possible, nor should SWBT be required to offer such a new prem-to-hub dark fiber service offering.

C. TCG Misunderstands SWBT's Current Dark Fiber Offering.

In its opposition, TCG states that:

For example, Southwestern Bell's dark fiber service, while it is a premises to premises high capacity service includes costs for central office electronics because SWBT will provide central office electronics for monitoring and testing. Accordingly, SWBT has admitted that its dark fiber services go into the central office, and presumably they are converted to electric signals and routed through the MDF, since TCG is aware of no

other way that SWBT could "monitor and test" its dark fiber services.<sup>54</sup>

The text that TCG is referencing refers to SWBT's ICB arrangements of several years ago, and not to the generally available tariff SWBT was required to file and which is now in effect. In companion orders issued in July 1991, the Commission ruled that SWBT must offer unpowered cable, i.e., without any electronics.<sup>55</sup> Hence, it is not possible to electrically interconnect SWBT dark fiber to interconnector services. In any event, SWBT has complied with the Special Access Order and should not be required to expand its dark fiber offering to encompass interconnection into collocated space.

VIII. OTHER TERMS AND CONDITIONS LISTED IN SWBT'S TARIFFS ARE REASONABLE.

A. SWBT's Terms for Adding to the Original Collocation Request Are Reasonable.

ALTS and TCG claim that SWBT's terms for adding to the original collocation request are unreasonable.<sup>56</sup> TCG alleges that the work involved in adding to the space should cost much less than the original request. TCG argues that the LECs should not treat additional orders for space as new orders and appears to suggest that they should not charge for these additional orders.<sup>57</sup>

SWBT will handle all interconnector requests as individually as possible to ensure that each interconnector pays

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<sup>54</sup> TCG, p. B-6.

<sup>55</sup> In the Matter of Local Exchange Carriers' Individual Case Basis DS3 Service Offerings, 6 FCC Rcd 4776 (1991), 6 FCC Rcd 4891 (1991).

<sup>56</sup> ALTS at p. 34. TCG at p. B-3.

<sup>57</sup> TCG at p. B-3.

for the costs it incurs. Only that work which is necessary to satisfy each interconnector request is completed with each request.

SWBT already assumes a great risk of having to absorb interconnection costs not recovered from interconnectors. For example, if all forecasted interconnectors do not collocate, then SWBT will have to absorb the build-out cost allocated to those forecasted interconnectors who did not collocate.

B. LECs Should not be Required to Offer Smaller Increments of Space.

TCG also complains that all LECs have not offered the option of a smaller increment if that is all that is available. It should be noted that the charge for floor space is minor, compared to other elements. For example, if an interconnector wants 80 sq. ft. versus 100 sq. ft. in Missouri, and if such an adjustment were allowed (which it is not), the interconnector would pay an annual fee of \$1,660.80 for 80 sq. ft. compared to \$2,076.00 for the entire 100 sq. ft. The costs of offering such a smaller option would be burdensome and impractical to implement.

SWBT chose 100 sq. ft., based on the existing precedent in the industry established by TCG and NYNEX. Standards were needed for efficient engineering, provisioning and administration. Therefore, based on the NYNEX experience and the need for provisioning standards, SWBT used 100 square feet as its minimum standard space and found no sufficient reason to vary from the already established standards. Furthermore, because SWBT cannot guarantee the availability of contiguous space for subsequent orders, smaller increments of space, i.e., 10 sq. ft. (if available) at the opposite end of the collocation facilities, would

be of no use to the collocator.

C. Interconnectors Should not be Allowed to "Warehouse" Floor Space.

TCG also complains that the SWBT requirement to place equipment in the collocated space within 60 days is unreasonable.<sup>58</sup> The 60-day requirement not only protects SWBT, but also protects the interconnectors from others who may "warehouse" the space. Without such a requirement, if one interconnector orders space greater than the capacity it actually needs, and pays only a percentage of the TAC, based on the forecasts, and space is exhausted, SWBT may not be able to recover the rest of the TAC from the other forecasted interconnectors. Further, the other interconnectors are obviously disadvantaged, since the space is not available for them, blocking them from collocating.

D. SWBT's Insurance Requirements are Reasonable.

TCG alleges that SWBT's requirement for interconnectors' insurers to be rated A+VII or better is unreasonable and that interconnectors should be allowed to use any insurer they choose.<sup>59</sup> SWBT's insurance requirements apply equally to everyone who conducts any type of work operation on SWBT's premises. These requirements have been in effect since August, 1987. These requirements are no more excessive or onerous than those imposed by SWBT on other entities.<sup>60</sup>

E. SWBT's Liability Terms are Reasonable.

MFS states its preference for a standardized set of

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<sup>58</sup> TCG at pp. B-8, B-9.

<sup>59</sup> TCG at pp. B-22, B-23.

<sup>60</sup> SWBT's Direct Case at p. 43.

liability rules, but gives no explanation for why SWBT's use of the same standards for collocators as with its access services customers is not reasonable.<sup>61</sup> Sprint claims there is a conflict between the standard that SWBT uses for collocators and the one used generally for other services in SWBT's tariff.<sup>62</sup> TCG alleges that SWBT has made no attempt to defend its use of the standard tariff provision for interconnectors.<sup>63</sup>

The oppositions essentially claim that the Commission may reject SWBT's previously effective tariff provisions in this proceeding. This allegation improperly describes the procedural status of this docket. Once a tariff provision goes into effect, the Commission may no longer reject it summarily.<sup>64</sup> Since SWBT has merely incorporated its standard tariff terms on this subject, the oppositions must bear a higher burden of proof. This burden has not been met with the unsupported claims of the oppositions.

F. SWBT's Termination Provisions are Reasonable.

ALTS complains that SWBT should be required to state a notice period in the event of breach, even though the term of collocation is month-to-month.<sup>65</sup> ALTS also claims that notice of SWBT plans in the event of catastrophic occurrence should be

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<sup>61</sup> MFS at pp. 24-26.

<sup>62</sup> Sprint at App. A, pp. 19-20.

<sup>63</sup> TCG at p. B-26.

<sup>64</sup> Teleport Communications Group Operating Companies Tariff, F.C.C. No. 1 et al., 8 FCC Rcd 3611 (Com. Car. Bur. 1993), at para. 7, app. for review pending. Especially noteworthy is the position taken by MFS and TCG where they argued that their tariffs could not be rejected in that proceeding because they had already taken effect. Id. at para. 6.

<sup>65</sup> ALTS at p. 36. See also TCG at p. B-11.



required.<sup>66</sup> SWBT's response is covered in its Direct Case,<sup>67</sup> and as with SWBT's liability provisions, it should not be modified here.

G. SWBT's Relocation Provisions are Reasonable.

TCG generally claims that the LEC provisions on relocation should be more definite as the current provisions are capable of abuse.<sup>68</sup> Consistent with existing customer treatment for moves and rearrangements, tariff charges would not apply to SWBT-initiated relocations. However, relocation costs and tariff charges resulting from moves initiated by interconnectors would be borne by the interconnector.

TCG's demands for reimbursement of its direct costs, and for a guarantee of continuous service, are unreasonable. Such demands are especially unreasonable, for example, in the event of a natural disaster.

TCG also asks for a specific set of reasons to justify relocation. However, it is noteworthy that not even TCG has suggested how such an all-inclusive list could be formed.

H. LEC Rights to Inspect Interconnector Space Should not be Unduly Restricted.

TCG requests a number of restrictions on the power of LECs to inspect the interconnector's space.<sup>69</sup> As explained in its Direct Case, however, SWBT must have the right to inspect

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<sup>66</sup> ALTS at p. 37. See also TCG at p. B-14.

<sup>67</sup> SWBT Direct Case at pp. 3-9.

<sup>68</sup> TCG at p. B-16.

<sup>69</sup> TCG at p. B-34.

interconnector space to protect its networks and employees.<sup>70</sup>

IX. CONCLUSION

For the reasons stated above, SWBT respectfully requests that its expanded interconnection tariffs be allowed to take full effect at the filed rates, excluding the Bureau's direct cost adjustments, and that the investigation, suspension and accounting order be ended.

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<sup>70</sup> SWBT Direct Case, at p. 47.

**CERTIFICATE OF SERVICE**

I, Joseph Meier, hereby certify that the foregoing "Rebuttal of Southwestern Bell Telephone Company", in CC Docket No. 93-162, has been served this 30th day of September, 1993 to the Parties of Record."

  
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